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10 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 DURK BANKS, et al.,

17  
18 Defendants.

No. CR 24-621(B)-MWF

STIPULATION REGARDING REQUEST FOR  
(1) CONTINUANCE OF TRIAL DATE AND  
(2) FINDINGS OF EXCLUDABLE TIME  
PERIODS PURSUANT TO SPEEDY TRIAL  
ACT

**CURRENT TRIAL DATE:** 10/14/2025  
**PROPOSED TRIAL DATE:** 01/20/2026

22 Plaintiff United States of America, by and through its counsel  
23 of record, the Acting United States Attorney for the Central District  
24 of California and Assistant United States Attorneys Ian V. Yanniello,  
25 Gregory W. Staples, and Daniel H. Weiner, and defendant DEANDRE  
26 DONTRELL WILSON ("defendant WILSON"), both individually and by and  
27 through his counsel of record, Craig A. Harbaugh; defendant DAVID  
28 BRIAN LINDSEY ("defendant LINDSEY"), both individually and by and

1 through his counsel of record, Robert A. Jones and Tillet J. Mills;  
2 and defendant ASA HOUSTON ("defendant HOUSTON"), both individually  
3 and by and through his counsel of record, Shaffy Moeel, ("the  
4 Stipulating Defendants"), hereby stipulate as follows:

5       1. The First Superseding Indictment in this case was filed on  
6 November 7, 2024. Defendant DURK BANKS ("Defendant BANKS") first  
7 appeared before a judicial officer of the court in which the charges  
8 in this case were pending on November 14, 2024. The Speedy Trial  
9 Act, 18 U.S.C. § 3161, originally required that the trial commence on  
10 or before January 23, 2025. Defendant WILSON first appeared before a  
11 judicial officer of the court in which the charges in this case were  
12 pending on November 15, 2024. The Speedy Trial Act, 18 U.S.C.  
13 § 3161, originally required that the trial commence on or before  
14 January 24, 2025. Defendant HOUSTON first appeared before a judicial  
15 officer of the court in which the charges in this case were pending  
16 on November 21, 2024. The Speedy Trial Act, 18 U.S.C. § 3161,  
17 originally required that the trial commence on or before January 30,  
18 2025. Defendant LINDSEY first appeared before a judicial officer of  
19 the court in which the charges in this case were pending on November  
20 22, 2024. The Speedy Trial Act, 18 U.S.C. § 3161, originally  
21 required that the trial commence on or before January 31, 2025.

22       2. On November 14, 2024, for defendant BANKS, the Court set a  
23 trial date of January 7, 2025. On November 15, 2024, for defendant  
24 WILSON, the Court set a trial date of January 7, 2025. On November  
25 21, 2024, for defendant HOUSTON, the Court set a trial date of  
26 January 14, 2025. On November 22, 2024, for defendant LINDSEY, the  
27 Court set a trial date of January 14, 2025.

1           3.    On January 2, 2025, the Court continued the trial date to  
2   October 14, 2025 for all defendants and made relevant excludable time  
3   findings under the Speedy Trial Act.

4           4.    The Second Superseding Indictment was filed as to all  
5   defendants on May 1, 2025. The trial date remained set for all  
6   defendants on October 14, 2025.

7           5.    All defendants are detained pending trial. The government  
8   estimates that its case-in-chief will last approximately two to three  
9   weeks. All defendants are joined for trial and a severance has not  
10   been granted.

11          6.    By this stipulation, the Stipulating Defendants move to  
12   continue the trial date to January 20, 2026. Additionally, the  
13   parties<sup>1</sup> move to set the following pretrial schedule:

14           a.    Expert disclosure deadline:

15                i.   Government disclosure<sup>2</sup>: September 1, 2025

16                ii.   Defense disclosure: November 1, 2025

17           b.    Pretrial motions other than motions *in limine* or  
18   motions regarding experts:

19                i.   Motions due: October 6, 2025

20                ii.   Oppositions due: October 27, 2025

21                iii.   Optional replies due: November 10, 2025

22                iv.   Hearing date: November 17, 2025  
23  
24  
25

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26           <sup>1</sup> The parties, including counsel for defendant BANKS, met and  
27   conferred regarding the proposed briefing schedule and deadlines set  
28   forth below.

<sup>2</sup> The government reserves the right to promptly supplement its  
disclosure and/or notice one or more rebuttal experts based on  
disclosures made by the defense on November 1, 2025.

1 c. Government's disclosures pursuant to Fed. R. Evid.  
2 404(b):<sup>3</sup> November 17, 2025

3 d. Motions *in limine*, including motions regarding  
4 experts:

5 i. Motions due: December 8, 2025

6 ii. Oppositions due: December 22, 2025

7 iii. Hearing date/pretrial conference: January 7, 2026

8 7. This is the second request for a continuance.

9 8. The Stipulating Defendants request the continuance based  
10 upon the following facts, which the parties believe demonstrate good  
11 cause to support the appropriate findings under the Speedy Trial Act:

12 a. All defendants are charged with violations of 18  
13 U.S.C. § 1958(a): Conspiracy and Use of Interstate Facilities to  
14 Commit Murder-For-Hire Resulting in Death; 18 U.S.C.  
15 §§ 2261A(2) (A), (B), 2261(b) (1): Stalking Resulting in Death; and 18  
16 U.S.C. §§ 924(c) (1) (A) (iii), (c) (1) (B) (ii), (j) (1): Use, Carry, and  
17 Discharge of Firearms and Machinegun, and Possession of Such  
18 Firearms, in Furtherance of a Crime of Violence, Resulting in Death.  
19 Discovery in this case includes, among other things, hundreds of  
20 gigabytes of digital evidence such as audio/video recordings,  
21 surveillance footage, and extractions of digital devices; and over  
22 30,000 pages of records and reports concerning murder and other  
23 violent acts, photographs, witness statements, and medical documents.

24 b. Due to the nature of the prosecution and the number of  
25 defendants, including the charges in the indictment and the  
26 voluminous discovery, this case is so unusual and so complex that it

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27  
28 <sup>3</sup> The government has also agreed to provide a preliminary  
disclosure on or before September 1, 2025.

1 is unreasonable to expect adequate preparation for pretrial  
2 proceedings or for the trial itself within the Speedy Trial Act time  
3 limits.

4 c. Defense counsel represent that they have various  
5 substantive obligations which necessitate the continuance of the  
6 trial to January 20, 2026. The list of obligations for defense  
7 counsel is attached hereto as Appendix A and is incorporated as if  
8 fully set forth herein.

9 d. In light of the foregoing, counsel for the Stipulating  
10 Defendants also represent that additional time is necessary to confer  
11 with defendants, conduct and complete an independent investigation of  
12 the case, conduct and complete additional legal research including  
13 for potential pre-trial motions, review the discovery and potential  
14 evidence in the case, and prepare for trial in the event that a  
15 pretrial resolution does not occur. Defense counsel represent that  
16 failure to grant the continuance would deny them reasonable time  
17 necessary for effective preparation, taking into account the exercise  
18 of due diligence.

19 e. The Stipulating Defendants believe that failure to  
20 grant the continuance will deny them continuity of counsel and  
21 adequate representation.

22 f. The government does not object to the continuance.

23 g. The requested continuance is not based on congestion  
24 of the Court's calendar, lack of diligent preparation on the part of  
25 the attorney for the government or the defense, or failure on the  
26 part of the attorney for the Government to obtain available  
27 witnesses.

1           9. For purposes of computing the date under the Speedy Trial  
2 Act by which defendants' trial must commence, the parties agree that  
3 the time period from the date this stipulation is filed to January  
4 20, 2026, inclusive, should be excluded pursuant to 18 U.S.C.  
5 §§ 3161(h)(7)(A), (h)(7)(B)(i), (h)(7)(B)(ii) and (h)(7)(B)(iv)  
6 because the delay results from a continuance granted by the Court at  
7 defendants' request, without government objection, on the basis of  
8 the Court's finding that: (i) the ends of justice served by the  
9 continuance outweigh the best interest of the public and defendant in  
10 a speedy trial; (ii) failure to grant the continuance would be likely  
11 to make a continuation of the proceeding impossible, or result in a  
12 miscarriage of justice; (iii) the case is so unusual and so complex,  
13 due to the nature of the prosecution and the number of defendants  
14 that it is unreasonable to expect preparation for pre-trial  
15 proceedings or for the trial itself within the time limits  
16 established by the Speedy Trial Act; and (iv) failure to grant the  
17 continuance would unreasonably deny defendant continuity of counsel  
18 and would deny defense counsel the reasonable time necessary for  
19 effective preparation, taking into account the exercise of due  
20 diligence.

21           10. Defendant BANKS does not join in the stipulation to  
22 continue the trial in this matter. Nonetheless, the stipulating  
23 parties agree that, pursuant to 18 U.S.C. § 3161(h)(6), the time  
24 period from the date the stipulation is filed to January 20, 2026,  
25 inclusive, constitutes a reasonable period of delay for defendant  
26 BANKS, who is joined for trial with codefendants as to whom the time  
27 for trial has not run and no motion for severance has been granted.  
28

1 11. Nothing in this stipulation shall preclude a finding that  
2 other provisions of the Speedy Trial Act dictate that additional time  
3 periods be excluded from the period within which trial must commence.  
4 Moreover, the same provisions and/or other provisions of the Speedy  
5 Trial Act may in the future authorize the exclusion of additional  
6 time periods from the period within which trial must commence.

7 IT IS SO STIPULATED.

8 Dated: September 12, 2025

Respectfully submitted,

9 BILAL A. ESSAYLI  
10 Acting United States Attorney

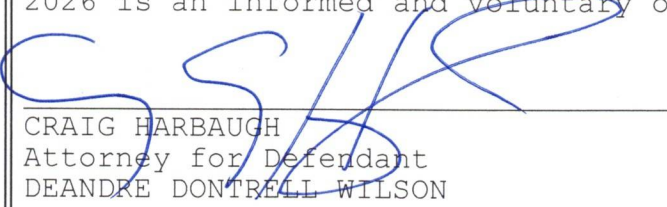
11 JOSEPH T. MCNALLY  
12 Assistant United States Attorney  
Acting Chief, Criminal Division

13 /s/  
14 \_\_\_\_\_  
IAN V. YANNIELLO  
15 GREGORY W. STAPLES  
DANIEL H. WEINER

16 Assistant United States Attorneys

17 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

1 I am DEANDRE DONTRELL WILSON's attorney. I have carefully  
2 discussed every part of this stipulation and the continuance of the  
3 trial date with my client. I have fully informed my client of his  
4 Speedy Trial rights. To my knowledge, my client understands those  
5 rights and agrees to waive them. I believe that my client's decision  
6 to give up the right to be brought to trial earlier than January 20,  
7 2026 is an informed and voluntary one.

8   
9 CRAIG HARBAUGH  
10 Attorney for Defendant  
DEANDRE DONTRELL WILSON

08/25/25  
Date


11  
12 I have read this stipulation and have carefully discussed it  
13 with my attorney. I understand my Speedy Trial rights. I  
14 voluntarily agree to the continuance of the trial date, and give up  
15 my right to be brought to trial earlier than January 20, 2026.

16   
17 DEANDRE DONTRELL WILSON  
18 Defendant

08/25/25  
Date




1 I am DAVID BRIAN LINDSEY's attorney. I have carefully discussed  
2 every part of this stipulation and the continuance of the trial date  
3 with my client. I have fully informed my client of his Speedy Trial  
4 rights. To my knowledge, my client understands those rights and  
5 agrees to waive them. I believe that my client's decision to give up  
6 the right to be brought to trial earlier than January 20, 2026 is an  
7 informed and voluntary one.

8   
9 ROBERT A. JONES  
10 TILLET J. MILLS  
11 Attorney for Defendant  
12 DAVID BRIAN LINDSEY

09/11/2025  
Date

13 I have read this stipulation and have carefully discussed it  
14 with my attorney. I understand my Speedy Trial rights. I  
15 voluntarily agree to the continuance of the trial date, and give up  
16 my right to be brought to trial earlier than January 20, 2026.

17   
18 DAVID BRIAN LINDSEY  
19 Defendant

09-02-2025  
Date

1 I am ASA HOUSTON's attorney. I have carefully discussed every  
2 part of this stipulation and the continuance of the trial date with  
3 my client. I have fully informed my client of his Speedy Trial  
4 rights. To my knowledge, my client understands those rights and  
5 agrees to waive them. I believe that my client's decision to give up  
6 the right to be brought to trial earlier than January 20, 2026 is an  
7 informed and voluntary one.

8 

9 \_\_\_\_\_  
10 SHAFFY MOEEL  
11 Attorney for Defendant  
12 ASA HOUSTON

09/08/2025

\_\_\_\_\_  
Date

13 I have read this stipulation and have carefully discussed it  
14 with my attorney. I understand my Speedy Trial rights. I  
15 voluntarily agree to the continuance of the trial date, and give up  
16 my right to be brought to trial earlier than January 20, 2026.

17 

18 \_\_\_\_\_  
19 ASA HOUSTON  
20 Defendant

9/06/2025

\_\_\_\_\_  
Date

# APPENDIX A

**Counsel for Defendant Lindsey:**

1. State of Texas v. Williams, Case No. 23-1895-K368; Aggravated Sexual Assault of a Minor; currently set for trial on October 17, 2025;
2. US v. Seery, Case No. 4:25-CR-146 (S.D. Texas); Murder-for-Hire Conspiracy; currently set for trial on November 17, 2025; and
3. US v. Contreras, Case No. 4:24-CR-476 (S.D. Texas); Conspiracy with Intent to Distribute Controlled Substance; currently set for trial on December 15, 2025.